

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

JIMMIE LEWIS,  
PLAINTIFF,

V.

CA. NO. 05-013 (GMS)

RAPHEL WILLIAMS, ETAL.

AFFIDAVIT IN SUPPORT OF PLAINTIFF'S MOTION  
FOR THE APPOINTMENT OF COUNSEL

COMES NOW, THE PLAINTIFF JIMMIE LEWIS, PRO- SE  
AND ASSERTS THE FOLLOWING IN SUPPORT FOR THE  
APPOINTMENT OF COUNSEL.


- 1.) I AM THE PLAINTIFF IN THE ABOVE CAPTIONED CASE.  
I MAKE THIS AFFIDAVIT IN SUPPORT FOR THE  
APPOINTMENT OF COUNSEL.
- 2.) THE COMPLAINT IN THIS CASE ALLEGES THAT THE PLAINTIFF  
WAS SUBJECTED TO ABUSES OF FORCE BY SEVERAL  
CORRECTIONAL OFFICERS, SOME OF WHOM ACTIVELY PUNCHED,  
KICKED, TREATENED AND SPRAYED ME WITH CAPSTUN,  
FOR WHICH THERE WAS NO JUSTIFIABLE CAUSE, AS OTHER  
OFFICERS WATCHED AND FAILED TO INTERVENE.

CONT # 2.) . ALSO, THE PLAINTIFF ALLEGES THAT HE WAS SUBJECTED TO NUMEROUS UNCONSTITUTIONAL HOUSING AND MEDICAL CONDITIONS, THAT SUBSEQUENTLY MANIFESTED INTO MANY INCIDENTS OF DELIBERATE INDIFFERENCE AND DUE PROCESS VIOLATIONS. THE COMPLAINT ALLEGES THAT SUPERVISORY OFFICIALS WERE DULY NOTIFIED AND FULLY AWARE OF THE VIOLENT PROPENSITIES, MEDICAL AND MENTAL HEALTH CARE VIOLATIONS, UNCONSTITUTIONAL HOUSING VIOLATIONS AND DUE PROCESS VIOLATIONS, BUT FAILED TO CORRECT, ACT OR RESPOND TO SAID VICTIONS, AND THEREFOR ARE LIABLE FOR FAILING TO TAKE ACTION AFTER BEING DULY NOTIFIED.

- 3.) THIS IS A COMPLEX CASE BECAUSE IT CONTAINS SEVERAL DIFFERENT LEGAL CLAIMS, INVOLVING MORE THAN 60 DIFFERENT DEFENDANTS.
- 4.) THIS CASE REQUIRES EXPERT TESTIMONY INVOLVING COMPLEX MEDICAL AND PSYCHOLOGICAL ISSUES.
- 5.) THE PLAINTIFF IS PRESENTLY PRESCRIBED SEVERAL PSYCHOTROPIC MEDICATIONS, NAMELY, RISPRADOL 5mg's, COGENTIN, CYNQUAN(150) FOR HIS CRONIC MENTAL ILLNESSES, IN WHICH THE PLAINTIFF'S MENTAL ILLNESSES MAY INTERFERE WITH COURT PROCEEDINGS.
- 6.) THE PLAINTIFF IS PRESENTLY INCARCERATED IN THE (S.H.U) SECURITY HOUSING UNIT, AND HAS VERY LIMITED ACCESS TO LEGAL MATERIAL, AND NO ABILITY TO PERSONALLY INVESTIGATE THE FACTS OF THE CASE.

- 7.) THIS CASE WILL REQUIRE DISCOVERY OF DOCUMENTS AND DISPOSITION OF A NUMBER OF DEFENDANTS AND WITNESSES.
- 8.) THE PLAINTIFF HAS ONLY A HIGH SCHOOL EDUCATION, AND NO LEGAL EDUCATION.
- 9.) THE PLAINTIFF IS INDIGENT AND CAN NOT AFFORD TO RETAIN A PRIVATE ATTORNEY.
- 10.) AS SET FORTH IN THE MEMORANDUM OF LAW SUBMITTED WITH THIS AFFIDAVIT, THESE FACTS, ALONG WITH THE FACTUAL LEGAL MERIT OF THE PLAINTIFF'S COMPLAINTS, SUPPORT THE APPOINTMENT OF COUNSEL TO REPRESENT THE PLAINTIFF AT TRIAL, IN THE SEARCH FOR TRUTH AND JUSTICE IN THIS MATTER, AS IS ESTABLISHED IN THE U.S. CONSTITUTION.

DATED : 3/3/06

SIGNED:   
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